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December 19, 2007

Via Facsimile to: 212-805-7928

The Honorable Michael H. Dolinger
Magistrate Judge, United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: Julia Pichardo v. New York University
S.D.N.Y. - Docket No.: 07 civ 6034
Date of Loss: May 4, 2004
Our File No.: 40824

**ENDORSED
ORDER**

*Discovery will be stayed
through Dec. 31, 2007 in
expectation of a motion
by counsel to be
relieved. We will set
a date for a conference
in early January 2008.*

12/20/07

Dear Honorable Sir:

As you may recall, the law office of Goldberg & Associates has been retained to defend New York University ("NYU") in connection with the above-referenced action. I am writing to respectfully set forth NYU's position with regard to recent issues which have arisen in this personal injury case.

Recently, I was advised by Tom DeSimone, Esq., an attorney with the firm Joseph T. Mullen, Jr. & Associates that his firm will request leave to withdraw as counsel for Plaintiff. The reasons for the requested withdrawal are unknown to me. However, I was advised that by virtue of the circumstances leading towards the decision to withdraw, Plaintiff's counsel has been unable to respond to NYU's discovery demands.

To date, we have only received limited discovery from Plaintiff. Specifically, Plaintiff has furnished our office with two (2) authorizations to obtain some of her medical records. However, Plaintiff has not yet served a Rule 26 disclosure nor responded to NYU's requests for production of documents and interrogatories. Furthermore, the depositions of the parties have not proceeded.

Pursuant to the initial case order, the parties are required to complete all fact discovery on or before December 31, 2007. I am writing to request a stay of this deadline and leave to complete fact discovery until such time that the anticipated request to withdraw has been determined.

The Honorable Michael H. Dolinger

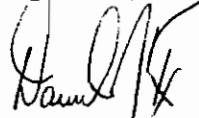
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If the Court directs the parties to appear either by telephone or in court regarding this matter, I would respectfully request that any conference be scheduled after January 1, 2008 because I will be away from New York during the holidays.

Thank you for your kind consideration of this matter.

Respectfully submitted,



DANIEL J. FOX

cc: **Via Facsimile to: 212-766-1131**
Thomas M. DeSimone, Esq.
Joseph T. Mullen, Jr. & Associates